

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

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SANABRIA ALEJANDRO, CARLOS A * * **CASE NO. 08-07361(GAC)**
ROMAN DELGADO, NELIDA *
Debtor *

*

RG MORTGAGE CORPORATION * * **CHAPTER 7**
Movant *

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SANABRIA ALEJANDRO, CARLOS A * *
ROMAN DELGADO, NELIDA *
Chapter 7 Trustee * * **INDEX A**
Wigberto Lugo Mender *

*

DEBTOR *

**TRUSTEE'S REPLY TO RG MORTGAGE REQUEST FOR
RELIEF FROM THE AUTHOMATIC LIFT FROM STAY**

TO THE HONORABLE COURT:

COMES NOW, Wigberto Lugo Mender, duly appointed trustee of the above captioned case, who respectfully states and prays as follows:

1. The above captioned petition was filed as a Chapter 7 on October 31, 2008.
2. The meeting of creditors in this case was held on December 3, 2008.
3. RG Mortgage holds a lien over the above-captioned debtor's property located at RD 924, Km 1.8, El Faro Pitahata, Humacao, Puerto Rico.
4. On April 22, 2009, RG Mortgage filed a motion requesting relief of pursuant to 11 U.S.C. § 362 (d)(1) and d(2) for failure to pay mortgage payments.
5. In response to request to lift the automatic stay, the Trustee states that at this time, he is pursuing all possible sale efforts in the sale of the property. With this settlement, the secured creditor should be paid in full.

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6. The trustee further states that the value of the real property greatly exceeds the amount claimed by the secured creditor. An adequate equity cushion exists to provide adequate protection to this creditor.

7. The trustee respectfully states that he is going to continue sale efforts. However, he has no objection to the modification of the automatic stay allowing RG Mortgage to commence foreclosure proceedings but only up to the point of execution.

WHEREFORE, and for the reasons stated above, the Trustee in this case prays the Honorable court to take notice of these matters and to allow any further relief as deemed appropriate.

I HEREBY CERTIFY: That on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the parties appearing in said system

RESPECTFULLY SUBMITTED

In Guaynabo, PR, this 1 day of May of 2009.

I HEREBY CERTIFY: That on this same date I have mailed a true and exact copy of the preceding document to **Cardona Jimenez Law Offices**, PO Box 9023593, San Juan, PR 00902-3593.

s/Wigberto Lugo Mender
WIGBERTO LUGO MENDER
CHAPTER 7 TRUSTEE
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